

**Before The
Federal Communications Commission
Washington, D.C.**

In the matter of)	
)	
Digital Audio Broadcasting Systems)	
And Their Impact on the Terrestrial)	MM Docket 99-325
Radio Broadcast Service.)	
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)	

Reply Statement

As a professional television and radio engineer, licensed Amateur Radio operator and concerned citizen I wish to express my support for Mr. John Pavlica, Jr.'s Motion to Dismiss the Commissions Report and Order which permits the use of In-Band, On-Channel digital broadcasting within the AM and FM bands. This decision to allow the use of IBOC in its present form is not in the public interest.

Currently, this system has done little to demonstrate any improvement in audio quality over present day analog broadcasts. The quality of the audio produced by this system will not satisfy anyone with a critical set of ears. Due to low bit rate and audio coding, it will be impractical for this system to handle more advanced audio formats. The public will eventually be forced in to buying receivers and locked in to a system with a limited future.

The technology employed by the current IBOC system is proprietary to one company, Ibiquity, and is unavailable for others to examine. The major broadcast organizations and equipment manufacturing companies are backing iBiquity. All have an interest in seeing this system be adopted as the standard for digital broadcasting. The door has been effectively closed to competition with the reasoning that this is not going to be another AM stereo. There is no marketplace decision to be made here. It seems that everything is being steered by the large organizations. The public has nothing to say and in fact is probably largely unaware of what is happening. Is this in their best interest?

On AM, the NRSC mask was designed to accommodate analog broadcasts. IBOC stations do fit within this mask. However, the total continuous power of their digital sidebands exceeds that of the occasional products produced by an analog signal. Thus the potential for interference to the first adjacent channel exists. This may not be problematic for an area in which there are only a few well-placed stations but consider large metropolitan areas where the band is densely populated. The interference problem can become more severe, limiting the public's reception and causing loss of service area of lower power, weaker stations. Problems exist with FM IBOC as well. This needs re-

examining. In the aftermath of 9/11/2001, the impairment of any communications system cannot be taken lightly. In this case it can impair the public's ability to gain access of information they may need in times of crisis.

At the present time the public can be better served by improved receiver development. Techniques such as digital signal processing along with synchronous detection for AM receivers can help deliver higher quality from the existing analog radio service. This will give digital radio the time it needs to develop into something that is better than our present analog services and not just being digital for digital's sake. I believe there is a digital future for radio somewhere. IBOC is a nice experiment but I think we should look for something that's better, not just good enough. To truly deserve the name "HD Radio", as IBOC is referred to by its proponents, a system must be able to deliver the best possible signal to its listening audience. Serving the listening audience, the public, is the bottom line.

It is for these reasons and the reasons stated in Mr. John Pavlica, Jr.'s motion that I hope the Commission will reconsider its decision to permit IBOC digital broadcasting in the AM and FM bands. Let's bring this back in to the lab, off the airwaves and examine things more.

Respectfully submitted,

Gerald John Mehrab